



Jonathan Horne
jhorne@rosenlegal.com

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BY CM/ECF

The Hon. Richard M. Berman
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
Courtroom 17B
New York, NY 10007

Re: *Wang v. China Finance Online Co. Ltd.*, et al., 1:15-CV-7894-RMB

Dear Judge Berman:

We represent court-appointed Lead Plaintiffs Jihong Wang, Qi Li, and Les Akio Omori (“Plaintiffs”), in the above-referenced securities class action against China Finance Online Co. Ltd. (“China Finance”) and certain of its directors and officers. On December 22, 2015, we filed a letter (the “December 22 Letter”) seeking a pre-motion conference concerning our proposed motion (the “Proposed Motion”) to, among other things, serve Defendants Neo Chee Beng (“Beng”) and Kheng Nam Lee (“Lee”), both directors, pursuant to Federal Rule of Civil Procedure 4(f)(3), by transmittal of a complaint and summons to defendant China Finance and also to its counsel, Proskauer Rose LLP, with instructions to transmit the documents to Beng and Lee. It has come to our attention that Beng and Lee recently resigned as directors of China Finance. We apologize for the error.

Accordingly, we no longer intend to seek in our Proposed Motion to serve Defendants Beng and Lee through FRCP 4(f)(3). We continue to intend to seek an order compelling China Finance to provide us with current service addresses for Beng and Lee, as well as other relief requested in the December 22 Letter.¹

Respectfully submitted,
/s/ Jonathan Horne

cc: All counsel of record (by CM/ECF)

¹ As clarification, we also do not intend to seek to serve Defendant Rongquan Leng, a former director of China Finance, through FRCP 4(f)(3).